

# **EXHIBIT 4**

PR#67234

GOAD, JOHN

4/19/2011

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

D.G. by Next Friend G. Gail  
Stricklin, et al., for  
themselves and those similarly  
situated,

Plaintiff,

vs.

Class Action

Civil Action No.  
08-CV-074-GKF-FHM

C. BRAD HENRY, in his official  
capacity as Governor of the  
State of Oklahoma, et al.,

Defendant.

JOHN GOAD, VOLUME I

April 19, 2011

The videotaped deposition of JOHN GOAD, taken  
before Maria S. Winn, CSR, RPR and CRR, pursuant  
to the Federal Rules of Civil Procedure for the  
United States District Courts pertaining to the  
taking of depositions, at the Hilton Orrington,  
1710 Orrington Avenue, Evanston, Illinois,  
commencing at 9:04 a.m. on April 19, 2011.

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1 did you tell her who your client was or who you  
2 were consulting for?

3 A Yes.

4 Q Did you tell her Children's Rights?

5 A Yes.

6 Q Did you tell her that the job or the  
7 potential job involved a lawsuit?

8 A Yes.

9 Q Did you show her any pleadings from the  
10 lawsuit?

11 A I don't believe I did.

12 Q Did you show her your 2009 report, which  
13 was Exhibit 1?

14 A I don't think I did. I remember thinking  
15 about doing it, because I thought it would be  
16 useful for her to look at the procedure portion of  
17 it, but I think I opted not to, because I actually  
18 didn't want her to read the conclusions.

19 Q Now, there was an Inter-Rater Review test  
20 done here. Describe in general terms how that was  
21 done, and then we may talk about it in more  
22 particulars.

23 A There were a number of cases that were  
24 randomly selected -- here we go with that random  
25 selection stuff again.

1           That were randomly selected from the  
2       samples that had already been selected in each of  
3       the four categories, and they were reviewed both  
4       by Adele Prass and by me. And then Richard  
5       Thompson compared the results of our findings in  
6       those cases to determine whether or not, if asked  
7       the same question, we would come up with the same  
8       answer.

9           Q     So did Dr. Thompson select from the  
10       samples, a smaller sample?

11          A     Correct.

12          Q     By some statistical method?

13          A     Some magical way.

14          Q     Some magical way, okay.

15                And then did you and Ms. Prass use the  
16       Appendix B document and independently, separately  
17       review those that were chosen?

18          A     Yes.

19          Q     And then Dr. Thompson took the data that  
20       was entered in the system and did some statistical  
21       thing that shows up in, I think, Appendix A?

22          A     Yes, he compared the results and came up  
23       with Kappa scores.

24          Q     What's a Kappa score?

25          A     I can give you a somewhat crude